EXHIBIT 1

In the Matter of:

Rysta Leona Susman, et al.
vs.
The Goodyear Tire & Rubber Company

Jacob Summers October 24, 2018



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Jacob Summers - 10/24/2018

	25
1	A I honestly don't remember. It's been a long
2	time. I just know we used a truck from the company each
3	day.
4	Q Okay. Do you have a driver's license?
5	A No, not currently.
6	Q Did you have one in 2015?
7	A If I remember correctly, yes.
8	Q When did you Did you obtain a driver's
9	license at at the time you turned 16?
10	A Yes.
11	Q And was your license ever suspended at any time
12	after that?
13	A No, not No.
14	Q Was it ever revoked?
15	A Yes.
16	Q When was it revoked?
17	A It was revoked when I got a D-U-I.
18	Q And when did you get the D-U-I?
19	A Two thousand twelve (2012).
20	Q Have you ever had your driver's license
21	reinstated any any time after 2012?
22	A Yes.
23	Q When was it reinstated?
24	A Shortly before I started at Dandee, I think.
25	Q Okay. And And have you lost your driving

Jacob Summers - 10/24/2018

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71
    me -- let me make sure I ask this. Have you had any
 1
 2
    criminal convictions other than the D-U-I's that you told
 3
    me about?
 4
          Α
               Yes.
 5
          0
               What have they been?
               For how long -- Like from the beginning or --
 6
          Α
 7
               From the beginning.
          Q
 8
               When I was younger I had marijuana possessions,
9
    paraphernalia possessions.
10
               Well, what age?
               I started when I think I was 16 and I --
11
12
          0
               Okay.
13
               -- just pursued from there, and then I think I
          Α
14
    had a possession of legend drugs.
15
               I'm sorry?
               I think I have a possession of legend drugs at
16
17
    one point.
               What drugs?
18
          0
19
               They're muscle relaxers.
          Α
20
               When was that?
          Q
               I was still in high school, I don't remember
21
22
    what age I was.
23
               I think I maybe had a -- I broke the window out
24
    of someone's house during a fight. I don't know what
25
    they would con- -- I think it was like vandalism or
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Jacob Summers - 10/24/2018

72 destruction of property. That was when I was still a 1 teenager and in high school. And I had -- I think I 2 3 might've had an assault. 4 Who did you assault? 5 Α I have no idea. It was just a stupid fight 6 when I was younger. 7 Q Okay. And then from there just basically possession 8 9 of the marijuana and paraphernalia. And the D-U-I's, 10 obviously. 11 And then I had an attempt -- they tried to give 12 me possession of a controlled substance, but my lawyer 13 got it dropped down to attempt to possess, because I was 14 not in possession of the substance. 15 They found empty pill capsules underneath the seat of my car when they had pulled me over and tried to 16 17 search my car they said they smelled marijuana, but at that time I wasn't smoking and there was none in the car. 18 19 And I told them they could not search, but they said 20 because they smelled marijuana that they could. 21 And they searched the car and I had absolutely no idea there was anything in there, because I -- me and 22 23 my brother -- I let my brother borrow it and between me 24 and him we both used the vehicle. But there was -- there was empty pill capsules underneath my seat; little 25